

Park 80 West-Plaza One 250 Pehle Avenue Suite 401 Saddle Brook, NJ 07663 (201) 845-9600 Main (201) 845-9423 Fax

Attorneys at Law

njlawfirm.com

Jeffrey W. Herrmann, Esq. jwh@njlawfirm.com

February 15, 2022

VIA ECF

Honorable Sharon A. King, U.S.M.J. Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets Camden, NJ 08101

> Re: Dunn, et al., v. PHH Mortgage Corporation Civil Action No.: 1:20-cv-05848-RBK-KMW

Dear Judge King:

On January 19, 2022, the Court entered an Order rescheduling a discovery dispute teleconference for February 16, 2022. The Parties hereby jointly respectfully request another four week extension of this date for the following reasons.

On February 9, 2022, the Parties continued settlement negotiations that began in December. On Thursday, February 17, 2022, the Parties will continue their discussions. When the parties meet again on Thursday, they will have conferred with their respective clients concerning each side's settlement proposals and the relevant case law. Therefore, in the interests of judicial economy, the Parties request an adjournment of the discovery teleconference.

Should the Court have questions about this request, please let us know.

Respectfully,

COHN LIFLAND PEARLMAN HERRMANN & KNOPF LLP

/s/Jeffrey W. Herrmann
Jeffrey W. Herrmann
Attorney(s) for Plaintiff(s)

STADLEY, RONON, STEVENS & YOUNG, LLP

/s/ Joe. N. Nguyen
Joe N. Nguyen
Attorney(s) for Defendant(s)